

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA .

v. .

Criminal No. DKC-19-273

DAMON DELOATCH .

**CONSENT MOTION TO MODIFY RELEASE CONDITIONS TO REMOVE CURFEW
AND LOCATION MONITORING CONDITIONS**

Mr. Damon Deloatch, by his undersigned counsel, hereby moves this Honorable Court to modify release conditions to remove the conditions of residence curfew and location monitoring. The Government and Pretrial Services consent to this request. In support, Mr. Deloatch states as follows:

1. Mr. Deloatch was released on July 5, 2019, with location monitoring conditions imposed. *See* Dkt. 17. On March 5, 2020, conditions were modified to residence curfew location monitoring by which Mr. Deloatch was permitted leave from the home from 7:00 a.m. until 7:00 p.m. *See* Dkt. 18.
2. Mr. Deloatch is compliant with release conditions.
3. On March 8, 2021, Defense counsel, Pretrial Services, and Mr. Deloatch conferred about an employment offer for Mr. Deloatch that entails night shift assembly line packaging work. The employment would begin on Monday, April 12, 2021. Current release conditions would not accommodate the employer's work schedule for Mr. Deloatch.
4. In consideration of Mr. Deloatch's progress and compliance on release supervision and the Bail Reform Act's requirement under 18 U.S.C. § 3142(c)(1)(B) that Mr. Deloatch be subjected to the "least restrictive further condition[s]" that will reasonably assure

appearance and community safety, Pretrial Services recommends that the location monitoring and curfew conditions be removed. The Defense joins in Pretrial's release modification recommendation and the Government consents to the request.

WHEREFORE, with the consent of the Government and Pretrial Services, Mr. Deloatch moves this Court to modify release conditions to remove the conditions of curfew and location monitoring. A proposed order is attached.

Respectfully submitted,

/s/

SEDIRA S. BANAN (#804827)
Assistant Federal Public Defender
Office of the Federal Public Defender
Tower II - 9TH Floor
100 South Charles Street
Baltimore, Maryland 21201
(410) 962-3962 (t)
(410) 962-0872 (f)
Sedira_Banan@fd.org